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May 3, 2019

BY HAND DELIVERY AND ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Request for Confidential Treatment – Puerto Rico Telephone Company Inc. d/b/a Claro Section 63.63 Emergency Discontinuance Application – WC Docket No. 18-240

Dear Ms. Dortch:

Pursuant to Sections 0.457 and 0.459 of the Commission's rules,¹ Puerto Rico Telephone Company, Inc. d/b/a Claro ("PRTC"), by its attorneys, respectfully requests that the Commission withhold from public inspection and accord confidential treatment to portions of PRTC's Application Renewal that have been redacted. Accordingly, the enclosed application renewal is stamped "Confidential – Not for Public Inspection" and PRTC asks that the presentation marked "Confidential—Not for Public Inspection" be withheld from routine public inspection, as it contains sensitive business information.

The application renewal contains confidential and commercially sensitive information that falls within Exemption 4 of the Freedom of Information Act ("FOIA").² Exemption 4 permits parties to withhold from public information "trade secrets and commercial or financial information obtained from a person and privileged or confidential."³ Applying Exemption 4, the courts have stated that commercial or financial information is confidential if its disclosure will either (1) impair the government's ability to obtain necessary information in the future; or (2) cause

¹ 47 C.F.R. §§ 0.457 & 0.459.

² See 5 U.S.C. § 552(b)(4); 47 C.F.R. § 0.457(d).

³ 5 U.S.C. § 552(b)(4).

substantial harm to the competitive position of the person from whom the information was obtained.⁴

Section 0.457(d)(2) allows persons submitting materials that they wish to be withheld from public inspection in accordance with Section 552(b)(4) to file a request for non-disclosure, pursuant to Section 0.459. In accordance with the requirements contained in Section 0.459(b) for such requests, PRTC hereby provides the following information.

(1) *Identification of Specific Information for Which Confidential Treatment is Sought (Section 0.459(b)(1)).*

PRTC seeks confidential treatment of the information after the headings [*begin confidential information*] and before the headings [*end confidential information*].

(2) *Identification of the Commission Proceeding in Which the Information Was Submitted or a Description of Circumstances Giving Rise to Submission (Section 0.459(b)(2)).*

PRTC is the incumbent local exchange carrier in Puerto Rico, and its wireline facilities were damaged in Hurricanes Irma and Maria. PRTC sought, and received, authority to discontinue interstate telecommunications service on a temporary basis in certain affected areas in Puerto Rico.

(3) *Explanation of the Degree to Which the Information is Commercial or Financial, or Contains a Trade Secret or is Privileged (Section 0.459(b)(3)).*

The information for which PRTC seeks confidential treatment is plainly sensitive commercial information that companies would normally keep confidential and that PRTC, in fact, keeps confidential. See 5 U.S.C. § 552(b)(4). Disclosure of such information could have a significant impact on PRTC's commercial operations by enabling competitors to have a better understanding of PRTC's financial constraints after the hurricanes and its business plans and strategies, enabling such competitors to better compete against PRTC.

The Application contains information about PRTC that is clearly "commercial" in nature.⁵ Under well-settled case law, such material "is 'confidential' . . . if disclosure of the information is likely to have either of the following effects: (1) to impair the government's ability to obtain necessary information in the future; or (2) to cause substantial harm to the competitive position

⁴ See *National Parks and Conservation Ass'n v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974) (footnote omitted); see also *Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879-80 (D.C. Cir. 1992), cert. denied, 507 U.S. 984 (1993).

⁵ See *Board of Trade v. Commodity Futures Trading Comm'n*, 627 F.2d 392, 403 & n.78 (D.C. Cir. 1980) (courts have given the term "commercial," as used in Section 552(b)(4), its ordinary meanings).

of the person from whom the information was obtained.”⁶ In addition, the Commission has broadly defined commercial information, stating that “[c]ommercial’ is broader than information regarding basic commercial operations, such as sales and profits; it includes information about work performed for the purpose of conducting a business’s commercial operations.”⁷

(4) *Explanation of the Degree to Which the Information Concerns a Service that is Subject to Competition (Section 0.459(b)(4)).*

Substantial competition exists in Puerto Rico both in the wireline and wireless sectors. The presence of competitors makes imperative the confidential treatment of sensitive commercial information.

(5) *Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm (Section 0.459(b)(5)).*

Release of the confidential information in the application renewal could have a significant impact on PRTC’s commercial operations. If business partners/customers or competitors had access to this information, it could negatively affect PRTC’s future negotiations with potential and existing business partners/customers. Specifically, business partners/customers could use the information in the application renewal to negotiate more favorable terms in their own agreements. Competitors could use this information to better compete against PRTC. Thus, it is “virtually axiomatic” that the information qualifies for withholding under Exemption 4 of FOIA⁸ and under Sections 0.457(d)(2) and 0.459(b).

(6) *Identification of Measures Taken to Prevent Unauthorized Disclosure (Section 0.459(b)(6)).*

None of this information is provided to the public, and PRTC does not provide this information to third parties except pursuant to agreements to maintain confidentiality.

(7) *Identification of Whether the Information is Available to the Public and the Extent of Any Previous Disclosure of Information to Third Parties (Section 0.459(b)(7)).*

⁶ *National Parks and Conservation Ass’n v. Morton*, 498 F.2d 764, 770 (D.C. Cir. 1974) (footnote omitted); see also *Critical Mass Energy Project v. NRC*, 975 F.2d 871 (D.C. Cir. 1992), cert. denied, 113 S. Ct. 1579 (1993).

⁷ *Southern Company Request for Waiver of Section 90.629 of the Commission’s Rules*, Memorandum Opinion and Order, 14 FCC Rcd 1851, 1860 (1998) (citing *Public Citizen Health Research Group v. FDA*, 704 F.2d 1280, 1290 (D.C. Cir. 1983)).

⁸ See *National Parks and Conservation Ass’n v. Kleppe*, 547 F.2d 673, 684 (D.C. Cir., 1976).

PRTC has not made this information available to the public and has not disclosed the information to any third parties except pursuant to arrangements intended to maintain confidentiality.

(8) *Justification of Period During Which the Submitting Party Asserts that the Material Should Not be Available for Public Disclosure (Section 0.459(b)(8)).*

PRTC respectfully requests that the Commission withhold from public inspection indefinitely the confidential version of the application renewal and the confidential information contained therein. PRTC would not, in the normal course of business, provide this information to the public.

If the Commission determines that the confidential version of the application renewal or the confidential information contained therein should be disclosed publicly, PRTC requests that the Commission provide advance notice of this decision so that PRTC will have a reasonable opportunity to challenge the Commission's determination and/or reach agreement on a satisfactory protective order.

Please contact the undersigned with any questions.

Respectfully Submitted,

/s/ Eduardo R. Guzmán

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May 3, 2019

BY ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Puerto Rico Telephone Company, Inc. d/b/a Claro Section 63.63 Emergency
Discontinuance Application – WC Docket No. 18-240**

Dear Ms. Dortch:

On August 3, 2018, Puerto Rico Telephone Company, Inc. d/b/a Claro (“PRTC”) filed an application in the above referenced proceeding for authorization under Section 214(a) of the Communications Act, 47 U.S.C. § 214(a), and section 63.63 of the Commission’s rules for emergency discontinuance of PRTC’s wireline interstate telecommunications services, on a temporary basis, in certain areas of Puerto Rico where Hurricanes Irma and Maria damaged PRTC’s copper infrastructure (“Application”). The attachment to the Application identified the specific network nodes where PRTC determined that its copper infrastructure suffered irreparable or significant damage as a direct result of the Hurricanes. On September 21, 2018, PRTC requested that the Commission extend the authorization for emergency discontinuance of services for six months until April 1, 2019. On March 22, 2019, PRTC requested a second extension, until May 15, 2019, to allow it to finalize its restoration plan and identify for the Commission when comparable service would be deployed and which permanent solution would be deployed, in each of the affected areas.¹

PRTC submits the instant letter to (1) update the Commission on efforts that have led to the restoration of telecommunications services for a significant number of customers that were identified as affected in the Application; (2) request the renewal of the temporary authorization for the areas identified in Exhibits 2, 3, 4, and 5 to afford PRTC the necessary time to restore service based on the target dates set forth therein; and (3) request an indefinite renewal of the temporary authorization for the low density, high-cost areas identified in Exhibit 6.

¹ The request for an extension was made to allow PRTC representatives to meet with advisors to Chairman Pai and staff from the Wireline Competition Bureau prior to presenting its restoration plan. That meeting took place on March 27, 2019, *see* Letter from Eduardo R. Guzmán, counsel to Puerto Rico Telephone Company, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket 18-240 (filed Mar. 29, 2019).

I. UPDATE ON RESTORATION EFFORTS SINCE THE FILING OF THE APPLICATION

The Application identified *[begin confidential information]* *[end confidential information]* affected network nodes and approximately *[begin confidential information]* *[end confidential information]* affected customers. PRTC hereby informs the Commission that it has restored telecommunications services in the locations served by the 339 network nodes listed in Exhibit 1 to this letter by repairing the existing copper facilities that had been damaged as a result of the hurricanes. PRTC also restored service in the areas served by the following network nodes by deploying fiber-to-the-home (“FTTH”) facilities: 8000IP92 (Arecibo); 8300IP09 (Arecibo), and 57000IP02 (Las Piedras).² Customers in these areas will have access to the same TDM voice service that they received prior to the Hurricanes, which would not affect the rates they pay for the service. These efforts have reduced the number of affected customers to approximately *[begin confidential information]* *[end confidential information]*. As a result, the temporary authorization is no longer necessary in the areas identified in Exhibit 1 and the areas identified above where PRTC deployed FTTH.

II. REQUEST FOR EXTENSION OF TEMPORARY AUTHORIZATION IN NEW NETWORK DEPLOYMENT AREAS

As to the areas listed in Exhibits 2, 3, and 4, PRTC requests an extension of the temporary authorization to allow for the restoration of telecommunications services in accordance with the restoration plan that it has developed and the target dates that are set forth in those exhibits. PRTC has concluded that it is not practical or cost-efficient to restore telecommunications services by repairing the damaged last-mile copper infrastructure in these areas. Instead, PRTC has started implementing a restoration plan, which is based on broader network modernization initiatives that it had developed before the Hurricanes struck in late 2017, that relies on the deployment of new technologies to offer faster broadband speeds and reliable fixed voice telephony and other telecommunications services. The restoration plan has three components.

First, for those locations identified in Exhibit 2, PRTC has started deploying FTTH to replace its last-mile copper infrastructure. This deployment will allow PRTC to offer broadband speeds of up to 1,000 Mbps and restore TDM-based voice telephony service. Exhibit 2 also sets forth when PRTC expects to restore telecommunications services in each of the network nodes where PRTC is deploying FTTH. Customers in these areas will have access to the same TDM voice service that they received prior to the Hurricanes, which would not affect the rates they pay for the service. PRTC will be filing with the Commission the required notices of copper retirement and requests under section 63.71 of the Commission’s rules for authorization to discontinue any legacy telecommunications services that are incompatible with the use of FTTH. The efforts in the areas identified in Exhibit 2 would lead to the restoration of service in *[begin confidential information]* *[end confidential information]* network nodes

² PRTC filed its public notice of copper retirement in these areas on November 13, 2018. See Puerto Rico Telephone Company, Inc. Public Notice of Copper Retirement under Rule 51.333, WC Docket No. 18-352 (filed Nov. 13, 2018).

that PRTC listed in the Application and to more than *[begin confidential information]* *[end confidential information]* affected customers (*[begin confidential information]* *[end confidential information]* percent of the approximately *[begin confidential information]* *[end confidential information]* customers that remain affected as of today).

Second, for those locations identified in Exhibit 3, PRTC has started deploying a fixed wireless broadband network using its licenses in the 2.5 GHz band. This deployment will allow PRTC to offer broadband speed of up to 10 Mbps (download) in areas where the current copper infrastructure limits PRTC's ability to offer high-speed broadband. Starting in early 2020, PRTC will be offering a VoIP-based solution *[begin confidential information]*

[end confidential information] in these areas to replace the TDM-based voice telephony services that it offered prior to the hurricanes through its copper-based last mile facilities. The VoIP-based solution will be offered on a standalone basis at prices comparable to the TDM-based service that PRTC offered prior to the Hurricanes. As the deployment of this fixed wireless infrastructure progresses in these locations, PRTC will be filing with the Commission the required notices of copper retirement and requests under section 63.71 of the Commission's rules for authorization to discontinue its TDM-based voice telephony services in these areas (which would be replaced with a VoIP-based offering) and any legacy telecommunications services that no longer would be offered in these areas. The efforts in the areas identified in Exhibit 2 would lead to the restoration of service in *[begin confidential information]* *[end confidential information]* out of the *[begin confidential information]*

[end confidential information] network nodes that PRTC listed in the Application and to more than *[begin confidential information]* *[end confidential information]* affected customers (*[begin confidential information]* *[end confidential information]* percent of the approximately *[begin confidential information]* *[end confidential information]* customers that remain are affected as of today).

Third, for those locations in Exhibit 4, PRTC will deploy a 5G-based fixed wireless broadband network using its 28 GHz spectrum licenses. This deployment will allow PRTC to offer broadband speeds of up to 100 Mbps (download). In conjunction with these broadband offerings, PRTC will be offering a VoIP-based solution *[begin confidential information]*

[end confidential information] to replace the TDM-based voice telephony services that it offered prior to the hurricanes through its copper-based last mile facilities. The VoIP-based solution will be offered on a standalone basis at prices comparable to the TDM-based service that PRTC offered prior to the Hurricanes. As the deployment of this 5G fixed wireless infrastructure progresses in these locations, PRTC will be filing with the Commission the required notices of copper retirement and requests under section 63.71 of the Commission's rules for authorization to discontinue its TDM-based voice telephony services in those locations (which would be replaced with a VoIP-based offering) and legacy telecommunications services that no longer would be offered in those locations. The efforts in the areas identified in Exhibit 4 would lead to the restoration of service in *[begin confidential information]* *[end confidential information]* out of the *[begin confidential information]*

[end confidential information] IPs that PRTC identified in the Application and to more than *[begin confidential information]* *[end confidential information]* affected customers (*[begin confidential information]* *[end confidential information]* percent of the

approximately *[begin confidential information]* *[end confidential information]* customers that remain affected as of today).

PRTC respectfully requests that the temporary authorization for emergency discontinuance of service be extended as to these locations in a manner that affords PRTC the necessary time to restore service based on the target dates set forth in Exhibits 2, 3, and 4 and to obtain any necessary authorizations to discontinue service under section 63.71 of the Commission. In each of the areas covered by the temporary authorization, PRTC will continue to offer its affected customers a temporary Commercial Mobile Radio Services (“CMRS”)-based solution that provides both voice telephony and broadband.

III. REQUEST FOR EXTENSION OF TEMPORARY AUTHORIZATION IN COPPER REPAIR AREAS

As to the areas listed in Exhibit 5, PRTC requests an extension of the temporary authorization to allow PRTC to conclude the copper repair efforts and restore the TDM-based services that were offered prior to the hurricanes. Additional inspections performed after the Application was filed has led PRTC to conclude that the damage to the copper infrastructure in those areas, although significant, can be repaired on a cost-efficient manner. The efforts in the locations identified in Exhibit 5 would lead to restoration of service in *[begin confidential information]* *[end confidential information]* out of the *[begin confidential information]* *[end confidential information]* network nodes that PRTC identified in the Application as damaged and to *[begin confidential information]* *[end confidential information]* affected customers (*[begin confidential information]* *[end confidential information]* percent of the approximately *[begin confidential information]* *[end confidential information]* customers that remain affected as of today).

PRTC respectfully requests that the temporary authorization for emergency discontinuance of service be extended as to these locations in a manner that affords PRTC the necessary time to restore service based on the target dates set forth in Exhibit 5. PRTC will continue to offer its affected customers in each of these areas a CMRS-based solution that provides both voice telephony and broadband.

IV. REQUEST FOR INDEFINITE AUTHORIZATION FOR EMERGENCY DISCONTINUANCE OF TELECOMMUNICATIONS SERVICES

As to the areas identified in Exhibit 6, PRTC respectfully requests an indefinite authorization for emergency discontinuance of service that lasts at least until the Commission’s award of high-cost universal service funds in the *Uniendo a Puerto Rico Fund* proceeding has concluded.³ The *[begin confidential information]* *[end confidential information]* network nodes in this category are located in remote areas of Puerto Rico, mostly in the rugged interior of the island that is characterized by its mountainous tropical topography.⁴ These remote areas are

³ See *In the matter of the Uniendo a Puerto Rico Fund and the Connect USVI Fund, Order and Notice of Proposed Rulemaking*, 33 FCC Rcd 5404 (rel. May 29, 2018).

⁴ Exhibit 6 includes a map that shows the location of these areas.

sparsely populated: each of the network nodes on average serves less than 15 users, and there are only approximately *[begin confidential information]* *[end confidential information]* affected users in these areas. As the Puerto Rico Telecommunications Bureau⁵ has noted, “the mountainous inland areas of the island contain rocky terrain that challenge deployment of all types of infrastructure – roads, electricity, water, as well as telecommunications.”⁶

The combination of low population density, remote location, and high costs of deployment make it commercially infeasible to deploy new infrastructure in these areas without universal service high cost support. Indeed, in some of these areas broadband capabilities had been deployed prior to Hurricane Maria because of the support that PRTC received from the Commission through the Connect America Fund. Under these circumstances, PRTC respectfully submits that any permanent solution to deploy fixed broadband and voice service in the areas identified in Exhibit 6 will depend on how the Commission distributes high cost support under the *Uniendo a Puerto Rico Fund*. If the Commission adopts PRTC’s right-of-first refusal proposal, PRTC will restore service in each of these locations through the use of new technologies.⁷ If the Commission instead moves ahead with a competitive bidding process, whichever provider is selected to offer broadband service in those areas should be able to offer fixed voice service, particularly through a VoIP-based solution.

* * * * *

PRTC respectfully requests that the Commission accept this filing, take notice of the areas where service has been restored, and extend the temporary authorization for emergency discontinuation as requested herein. During the requested period PRTC will be keeping the Commission informed of its progress in restoring service as proposed herein.

Sincerely,

/s/ Eduardo R. Guzmán

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⁵ The Puerto Rico Telecommunications Bureau is the legal successor to the Telecommunications Regulatory Board of Puerto Rico.

⁶ See Comments of the Telecommunications Regulatory Board of Puerto Rico at 4, *In the matter of the Uniendo a Puerto Rico Fund and the Connect USVI Fund, Order and Notice of Proposed Rulemaking*, WC Docket No. 18-143, WC Docket No. 10-90, WC Docket No. 14-58 (filed July 26, 2018); see also Comments of Liberty Cablevision of Puerto Rico, LLC at 10, *id.* (filed July 26, 2018) (“In particular, it is especially difficult to deploy and maintain facilities that reach the population found in the mountainous central region of Puerto Rico.”).

⁷ See PRTC Comments, WC Docket No. 18-143, at 20-21 (Jul. 26, 2018); PRTC Reply Comments, WC Docket No. 18-143, at 7-8 (Aug. 8, 2018); PRTC Ex Parte, WC Docket No. 18-143, at 2 (Oct. 12, 2018); PRTC Ex Parte, WC Docket No. 18-143, slide 8 (Mar. 28, 2019).

EXHIBIT 1

Wire Center	Network Node ID
Adjuntas	1000IP6A
Adjuntas	1000IP6B
Aguada	2000IP12
Aguada	2000IP20
Aguada	2000IP23
Aguada	2000IP27
Aguada	2100IP02
Aguada	2100IP03
Aguada	2100IP04
Aguadilla	3000IP36
Aguadilla	3000IP37
Aguadilla	3100IP30
Aibonito	6000IP08
Anasco	7000IP03
Anasco	7000IP04
Anasco	7000IP08
Anasco	7000IP11
Anasco	7000IP17
Anasco	7000IP20
Anasco	7000IP22
Arecibo	8000IP16
Arecibo	8000IP27
Arecibo	8000IP29
Arecibo	8000IP31
Arecibo	8000IP45
Arecibo	8000IP47
Arecibo	8000IP52
Arecibo	8000IP63
Arecibo	8000IP66
Arecibo	8000IP76
Arecibo	8000IP77
Arecibo	8200IP06
Arecibo	8200IP36
Arecibo	8300IP18
Arecibo	8300IP32
Arecibo	8300IP94
Arroyo	9000IP06
Arroyo	9000IP07

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Arroyo	9000IP08
Arroyo	9000IP09
Arroyo	9000IP11
Arroyo	9000IP35
Barceloneta	12000IP09
Barceloneta	12000IP12
Barceloneta	12000IP14
Barceloneta	12000IP26
Barranquitas	14000IP12
Bayamon	15000I112
Bayamon	15000I138
Bayamon	15000I159
Bayamon	15000I203
Bayamon	15200I109
Bayamon	15200I111
Bayamon	15200I121
Bayamon	15200IP02
Bayamon	15200IP04
Bayamon	15200IP06
Bayamon	15200IP15
Bayamon	15200IP21
Bayamon	15200IP32
Bayamon	15200IP38
Bayamon	15200IP44
Bayamon	15200IP45
Bayamon	15200IP48
Bayamon	15200IP55
Bayamon	15200IP57
Bayamon	15200IP60
Bayamon	15200IP61
Bayamon	15200IP64
Bayamon	15200IP69
Bayamon	15200IP70
Bayamon	15200IP71
Bayamon	15200IP72
Bayamon	15200IP73
Bayamon	15200IP74
Bayamon	15200IP79
Bayamon	15200IP83
Bayamon	15200IP88
Bayamon	15200IP89
Bayamon	15200IP90
Bayamon	15200IP91

REDACTED – FOR PUBLIC INSPECTION

Bayamon	15200IP92
Bayamon	15200IP96
Bayamon	15200IP99
Bayamon	15500I144
Bayamon	15500IP51
Cabo Rojo	16000IP42
Cabo Rojo	16100IP05
Caguas	17050IP01
Caguas	17060IP01
Camuy	44000IP40
Camuy	44000IP58
Camuy	44300IP05
Camuy	44300IP70
Canovanas	58000IP08
Canovanas	58000IP17
Canovanas	58000IP26
Canovanas	58000IP32
Canovanas	58000IP62
Canovanas	58200IP60
Carolina	19000I119
Carolina	19000I217
Carolina	19000I313
Carolina	19000IP37
Carolina	19000IP88
Carolina	19100I102
Carolina	19100I117
Carolina	50000IP03
Carolina	50000IP04
Catano	20100IP06
Catano	20100IP07
Catano	20100IP09
Coamo	25000IP4A
Coamo	25100IP11
Coamo	25200IP34
Dorado	33000IP20
Dorado	33000IP26
Dorado	33000IP30
Fajardo	35000I14A
Florida	36000IP08
Florida	36000IP15
Guayama	40000IP21
Guayama	40000IP31
Guayama	40000IP46

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Guayama	40100IP40
Guayanilla	41000IP10
Guayanilla	41000IP14
Guayanilla	41100IP01
Guaynabo	42000IP30
Guaynabo	42000IP34
Guaynabo	42000IP37
Guaynabo	42000IP66
Guaynabo	76000IP16
Hatillo	44000IP48
Hatillo	44200I26B
Hatillo	44200IP26
Hatillo	44200IP30
Hormigueros	46000IP04
Hormigueros	46000IP07
Humacao	47000IP21
Humacao	47000IP40
Isabela	49100IP20
Jayuya	51000IP01
Jayuya	51000IP02
Jayuya	51000IP08
Jayuya	51000IP14
Jayuya	51000IP19
Juana Diaz	52000IP33
Juana Diaz	52000IP37
Juana Diaz	52000IP43
Juana Diaz	52100IP10
Juana Diaz	52100IP12
Lajas	53000IP04
Lajas	53000IP08
Lajas	53000IP10
Lajas	53000IP27
Lares	55000IP04
Lares	55000IP10
Lares	55000IP15
Lares	55000IP17
Lares	55000IP18
Las Marias	56000IP05
Las Marias	56000IP06
Las Piedras	57010IP01
Luquillo	61000IP03
Luquillo	61000IP06
Luquillo	61000IP27

REDACTED – FOR PUBLIC INSPECTION

Luquillo	61000IP31
Manati	63000IP02
Manati	63000IP04
Manati	63000IP06
Manati	63000IP11
Manati	63000IP29
Manati	63000IP32
Manati	63000IP34
Manati	63000IP48
Manati	63000IP59
Maunabo	65000IP09
Mayaguez	66000IP30
Mayaguez	66000IP51
Mayaguez	66000IP93
Mayaguez	66000IP94
Mayaguez	66300IP69
Mayaguez	66300IP70
Mayaguez	66300IP73
Mayaguez	66400IP59
Morovis	68000IP06
Morovis	68000IP07
Morovis	68000IP13
Morovis	68000IP21
Morovis	68000IP22
Morovis	68000IP25
Morovis	68000IP26
Morovis	68000IP27
Morovis	68000IP28
Morovis	68000IP29
Morovis	68000IP35
Naguabo	69000IP13
Naguabo	69000IP14
Naguabo	69000IP32
Naguabo	69100IP2A
Naranjito	70000IP09
Naranjito	70000IP14
Naranjito	70000IP23
Naranjito	70200IP03
Orocovis	71000IP05
Orocovis	71000IP17
Patillas	9100IP04
Patillas	9100IP06
Patillas	9100IP11

REDACTED – FOR PUBLIC INSPECTION

Patillas	9100IP12
Patillas	9100IP18
Patillas	9200IP28
Penuelas	75000IP03
Penuelas	75100IP13
Ponce	74000I142
Ponce	74000I173
Ponce	74000I177
Ponce	74000IP09
Ponce	74000IP36
Ponce	74000IP46
Ponce	74000IP71
Ponce	74200IP05
Ponce	74200IP09
Ponce	74300IP03
Quebradillas	77000IP10
Quebradillas	77200IP09
Quebradillas	77200IP10
Quebradillas	77200IP11
Quebradillas	77200IP22
Rincon	78000IP06
Sabana Grande	81000IP01
Sabana Grande	81000IP02
Sabana Grande	81000IP18
Salinas	82000IP21
San German	83000IP01
San German	83000IP03
San German	83000IP13
San Juan	42110IP10
San Juan	80000I144
San Juan	80000IP85
San Juan	84000IP12
San Juan	84000IP30
San Juan	84200IP03
San Juan	84200IP38
San Juan	84200IP39
San Juan	84200IP51
San Juan	91400I107
San Juan	91400I108
San Juan	91400I109
San Juan	91400I120
San Juan	91400I205
San Juan	91400I207

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San Juan	91400I217
San Juan	91400I228
San Juan	91400IP01
San Juan	91400IP02
San Juan	91400IP16
San Juan	91400IP17
San Juan	91400IP45
San Juan	91400IP48
San Juan	91400IP96
San Lorenzo	88000IP06
San Lorenzo	88000IP18
San Sebastian	86000I19A
San Sebastian	86000IP04
San Sebastian	86000IP10
San Sebastian	86000IP31
Santa Isabel	87000IP01
Santa Isabel	87000IP15
Santa Isabel	87000IP21
Santa Isabel	87000IP22
Santa Isabel	87000IP24
Santa Isabel	87000IP32
Santa Isabel	87000IP35
Toa Alta	89000IP04
Toa Alta	89000IP32
Toa Baja	20000IP19
Toa Baja	20000IP20
Toa Baja	20000IP28
Toa Baja	20000IP30
Toa Baja	20000IP31
Toa Baja	20000IP59
Toa Baja	20200IP11
Trujillo Alto	91000I109
Trujillo Alto	91000I201
Trujillo Alto	91000I202
Trujillo Alto	91000I203
Trujillo Alto	91000IP01
Trujillo Alto	91000IP02
Trujillo Alto	91000IP06
Trujillo Alto	91000IP11
Trujillo Alto	91000IP12
Trujillo Alto	91000IP28
Trujillo Alto	91000IP32
Trujillo Alto	91000IP40

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Trujillo Alto	91000IP43
Trujillo Alto	91000IP44
Trujillo Alto	91000IP65
Trujillo Alto	91000IP73
Trujillo Alto	91000IP79
Trujillo Alto	91000IP80
Trujillo Alto	91000IP81
Trujillo Alto	91200I110
Trujillo Alto	91200I115
Trujillo Alto	91200IP10
Trujillo Alto	91200IP14
Trujillo Alto	91200IP34
Utuaado	92000IP06
Utuaado	92000IP09
Utuaado	92000IP17
Utuaado	92100IP05
Vega Alta	93000IP01
Vega Alta	93000IP08
Vega Alta	93000IP45
Vega Baja	94000I267
Vega Baja	94000I312
Vega Baja	94000IP15
Vega Baja	94000IP24
Vega Baja	94000IP27
Vega Baja	94000IP38
Vega Baja	94000IP39
Vega Baja	94000IP40
Vega Baja	94000IP43
Vega Baja	94000IP49
Vega Baja	94000IP51
Vega Baja	94000IP53
Vega Baja	94000IP54
Vega Baja	94000IP58
Vega Baja	94000IP62
Vega Baja	94000IP65
Villalba	96000IP03
Yauco	98000I20A
Yauco	98000IP01
Yauco	98000IP03
Yauco	98000IP04
Yauco	98000IP24
Yauco	98000IP27
Yauco	98000IP35

EXHIBIT 2

[begin confidential information]

Wire Center	Network Node ID	Projected Date of Restoration
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[end confidential information]

EXHIBIT 3

[begin confidential information]

Wire Center	Network Node ID	Projected Date of Restoration
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[end confidential information]

EXHIBIT 4

[begin confidential information]

Wire Center	Network Node ID	Projected Date of Restoration
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[end confidential information]

EXHIBIT 5

[begin confidential information]

Wire Center	Network Node ID	Projected Date of Restoration
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[end confidential information]

EXHIBIT 6

[begin confidential information]

Wire Center	Network Node ID
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[end confidential information]